

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE:	§	Case No. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC,	§	Chapter 11 (Subchapter V)
	§	
Debtor.	§	

**SANDY HOOK FAMILIES’  
WITNESS AND EXHIBIT LIST**

Judge	Hon. Christopher M. Lopez
Hearing Date	Wednesday, October 12, 2022
Hearing Time	10:00 a.m. (CST)
Party’s Name	Sandy Hook Families
Attorney’s Names	Ryan Chapple, Randy Williams (Connecticut Plaintiffs) Avi Moshenberg, Jarrod Martin (Texas Plaintiffs)
Attorney’s Phone	512-477-5000 (Ryan Chapple and Randy Williams) 713-337-5580 (Avi Moshenberg) 713-356-1280 (Jarrod Martin)
Nature of Proceeding	Cash Collateral Motion [Dkt. 6]

Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (collectively, the “Texas Plaintiffs”) and David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker (collectively, the “Connecticut Plaintiffs” and together, the “Sandy Hook Families”) hereby submit this Witness and Exhibit List in connection with the hearing on (i) *Debtor’s Emergency Motion for an Interim and Final Orders (I) Authorizing the Use of Cash Collateral Pursuant to Sections 105, 361, and 363 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(B) and (II) Granting Adequate Protection to the Pre-Petition Secured Lender* (the “Cash Collateral Motion”)

[Dkt. 6]; to be held on Wednesday, October 12, 2022 at 10:00 a.m. (Central Standard Time):

The Sandy Hook Families reserve the right to supplement, amend, or revise this Witness and Exhibit List at any time prior to the hearing. The Sandy Hook Families reserve the right to supplement the Witness and Exhibit List with new witnesses and additional exhibits. Further, the Sandy Hook Families reserve the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Sandy Hook Families further reserve the right to introduce exhibits previously admitted.

#### **WITNESS LIST**

The Sandy Hook Families may call the following witnesses at the hearing:

1. Patrick Magill, proposed Chief Restructuring Officer of Debtor;
2. W. Marc Schwartz, former proposed Chief Restructuring Officer of Debtor;
3. Robert Roe, PQPR Holdings Limited, LLC corporate representative;
4. David Jones, managing member of JLJR Holdings, LLC, which is the managing member of PQPR Holdings Limited, LLC;
5. Any witness necessary to rebut the testimony of any witness called or designated by any other parties;
6. Any witness listed or called by any other party.

#### **EXHIBIT LIST**

The Sandy Hook Families may offer for admission into evidence any of the following exhibits at the hearing:

<b>No.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted/ Not Admitted</b>	<b>Disposition</b>
1.	Debtor's Emergency Motion for an Interim and Final Orders (I) Authorizing the Use of Cash Collateral Pursuant to Sections 105, 361, and 363 of the				

	Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(b) and (II) Granting Adequate Protection to the Pre-Petition Secured Lender [Dkt. 6]				
2.	Declaration of W. Marc Schwartz in Support of Voluntary Petition and First Day Motions [Dkt. 10]				
3.	Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 41]				
4.	Order Modifying Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 64]				
5.	Second Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 98]				
6.	Third Interim Order Authorizing Debtor's Use of Cash Collateral and Providing Partial Adequate Protection [Dkt. 151]				
	Any document or pleading filed in the above-captioned case				
	Any exhibits identified or offered by any other party				
	Any exhibits necessary for impeachment and/or rebuttal purposes				

Respectfully submitted this 10th day of October 2022.

**McDOWELL HETHERINGTON LLP**

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***Counsel for the Texas Plaintiffs***

and

**CHAMBERLAIN, HRDLICKA, WHITE,  
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***Bankruptcy Counsel for the Texas Plaintiffs***

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***Bankruptcy Counsel for Connecticut  
Plaintiffs***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Witness and Exhibit List has been served on counsel for Debtor, Debtor, and all parties receiving or entitled to notice through CM/ECF on this 10th day of October 2022.

/s/ Ryan E. Chapple  
Ryan E. Chapple